

**PROTECO SUPERFUND SITE, PENUELAS, PUERTO RICO
EPA CERCLA REQUEST FOR INFORMATION
ATTACHMENT I**

GENERAL RESPONSE/OBJECTIONS

Each response by BASF Agrochemical Products BV, Puerto Rico Branch d/b/a/ BASF Agricultural Products de Puerto Rico (hereinafter the "Company") to the Requests shall be subject to the general objections set forth herein, whether or not such objection is incorporated expressly into each response.

1. The Company objects to each of the Requests to the extent that they allege or infer that the Company, arranged for the disposal or treatment of hazardous substances at the PROTECO Superfund Site in Penuelas, Puerto Rico (the "Site") which were released at the Site and caused EPA to expend monies to respond to the release.

2. While it is the Company's objective to respond comprehensively to EPA's information requests, the responses below are based upon, and therefore necessarily limited by, records still in existence and information presently recollected and thus far learned in the course of preparing these responses. The Company acquired Cyanamid Agricultural de Puerto Rico, Inc. nearly nineteen (19) years ago; therefore, the Company's records are necessarily limited. The Company reserves the right to make changes to the response if, at any time, more complete information is discovered. The Company will supplement this response if any additional, responsive information is obtained by its investigation.

3. By responding to these Requests, the Company in no way admits that it arranged for the disposal of hazardous substances which were released at the Site. Moreover, the Company denies that it has any liability for any injury to the Site and reserves and does not waive any and all rights and/or defenses it may have. If it is determined that the Company has any liability for any injury to the Site, a reasonable basis exists for such harm to be apportioned, as set forth in *Burlington Northern & Sante Fe Railway Co. v. United States*, 179 S. Ct. 1879 (2009).

4. The Company objects to these Requests to the extent that they are overly broad, burdensome, not reasonably calculated to lead to information concerning the identification, nature and quantity of hazardous substances, seek information not in the Company's possession or control, and/or seek information concerning the activities of entities unrelated to the Company.

5. In addition to the narrative responses set forth below, the Company provides herewith in response to the Requests documents bates stamped as BAPBV000001 through BAPBV0000024.

RESPONSES TO THE REQUESTS

1. *Answer the following questions regarding the Company:*
 - a. *State the correct legal name and mailing address for the Company;*
 - b. *State the name(s) and address(es) of the President, Chief Executive Officer, and the Chairman of the Board (or other presiding officer) of the Company;*
 - c. *Identify the state/commonwealth and date of incorporation of the Company and the name of its agents for service of process in the state/commonwealth of incorporation and in Puerto Rico, if different; and*
 - d. *Identify any successor corporations, predecessor corporations, or other entities related to the Company. If the Company is or was a subsidiary or affiliate of another*

corporation or entity, identify each of those other entities' Chief Executive Officers, Presidents, and Chairpersons of the Board. Identify the state/commonwealth and date of incorporation and agents for service of process in the state/commonwealth of incorporation and in Puerto Rico, if different, for each entity identified in your response to this question.

Response:

- a. The correct legal name and mailing address for the Company is as follows:

BASF Agrochemical Products B.V., Puerto Rico Branch
d/b/a/ BASF Agricultural Products de Puerto Rico
State Road #2 KM 47.3
P.O. Box 243
Manati, PR 00674

- b. The names and addresses of the President, Chief Executive Officer, and the Chairman of the Board (or other presiding officer) of the Company

Ricardo Morales, Site Director
BASF Agrochemical Products B.V., Puerto Rico Branch
d/b/a/ BASF Agricultural Products de Puerto Rico
State Road #2 KM 47.3
Manati, PR 00674

- c. The state/commonwealth and date of incorporation of the Company and name of its agents for service of process in the state/commonwealth of incorporation and in Puerto Rico, if different, is as follows:

The Company is currently seeking information responsive to this Request. If such information is discovered, the Company will supplement this response within 30 days.

- d. The identify of any successor corporations, predecessor corporations, other entities related to the Company and, if the Company is a subsidiary or affiliate of another corporation or entity, the identify of each of those other entities' Chief Executive Officers, Presidents, and Chairpersons of the Board and the identify the state/commonwealth and date of incorporation and agents for service of process in the state/commonwealth of incorporation and in Puerto Rico, if different, for each entity identified are as follows:

The Company is currently seeking information responsive to this Request. If such information is discovered, the Company will supplement this response within 30 days

2. *State the corporate history of the Company, including all name changes and mergers. List all names under which the Company has operated and has been incorporated. For each other name, provide the following information:*

- a. *Whether that other company or business continues to exist, indicating the date and means by which it ceased operations (e.g. dissolution, bankruptcy, sale) if it is no longer in business;*
- b. *Names, addresses, and telephone numbers of all subsidiaries, unincorporated divisions or operating units, affiliates, and parent corporations if any, of that other company.*

Response: The Company is currently seeking information responsive to this Request. If such information is discovered, the Company will supplement this response within 30 days.

3. *Identify all changes in ownership relating to the Company from its date of incorporation to the present, including the date of any ownership change. If any owner was/is a corporation, identify if the corporation was a subsidiary or division of another corporation. In your identification of any corporation, it is requested that you provide the full corporate name, the state/commonwealth of incorporation, and all fictitious names used/held by that corporation.*

Response: The Company is currently seeking information responsive to this Request. If such information is discovered, the Company will supplement this response within 30 days.

4. *For each owner that is a subsidiary of another corporation identified in your answer to Request #3 above, please provide a chart that details the corporate structure from that other company through all intermediary entities to the ultimate corporate parent. For purposes of this information request, the term "ultimate corporate parent" means the corporate entity that, while owning or controlling the majority of the shares of common stock in a subsidiary corporation, is not primarily owned/controlled by another corporation.*

Response: The Company is currently seeking information responsive to this Request. If such information is discovered, the Company will supplement this response within 30 days.

5. *Describe any asset purchase agreements, whereby some or all of the assets of Cyanamid Agricultural de Puerto Rico, Inc. were ever sold to any other entity, including the date(s) the companies involved, and the terms of such asset purchase agreement(s). Please also provide information and supporting documentation relating to the July 1, 2000 acquisition of Cyanamid Agricultural de Puerto Rico, Inc. by BASF Aktiengesellschaft and the concurrent transfer of Cyanamid Agricultural de Puerto Rico, Inc.'s net assets, liabilities, and intangibles to the Company.*

Response: The Company is currently seeking information responsive to this Request. If such information is discovered, the Company will supplement this response within 30 days.

6. *Indicate whether the Company is the successor to any liabilities, including those under CERCLA, of Cyanamid Agricultural de Puerto Rico, Inc.*

Response: The Company is currently seeking information responsive to this Request. If such information is discovered, the Company will supplement this response within 30 days.

7. *Provide copies of the Company's authority to do business in Puerto Rico. Include all authorizations, withdrawals, suspensions, and reinstatements.*

Response: A copy of the Certificate of Good Standing for BASF Agrochemical Products B.V. (Register No. 11431), dated February 4, 2019, is provided at the above link, in the folder titled "Request No. 7 Documents". See Bates No. BAPBV000001.

8. *State the dates during which the Company owned, operated, or leased any portion of the Facility, and provide copies of all documents evidencing or relating to such ownership, operation, or lease, including but not limited to purchase and sale agreements, deeds, leases, etc.*

Response: Upon information and belief, Cyanamid Agricultural de Puerto Rico, Inc. commenced operation at the Facility in 1976. The Company acquired the Facility and took over operations on or about June 30, 2000. The Company did not lease any portion of the Facility.

9. *Indicate whether the Company has ever operated at a location other than the Facility. If yes, provide the correct names and addresses of the Company's other facilities where the Company carried out its operations.*

Response: The Company has never operated at a location other than the Facility.

10. *Describe in detail the nature of the business and the operations conducted at the Facility and at any locations identified in response to Request #9, above, during the period that the Company operated there. Provide a brief description of the Company's operations at each facility, including the following:*

- a. The date such operations commenced and concluded; and
- b. The types of work performed at each facility, including but not limited to the industrial, chemical, or institutional processes and treatments undertaken at each facility.

Response: The facility has manufactured and/or formulated agrochemicals since 1976. Based upon a diligent search of available records, only seven (7) shipments of the hazardous waste stream at issue (solvent recovery still bottoms with traces of toluene) (aka "Tars") were sent to the Site in 1985.

No records of offsite hazardous waste disposal prior to 1985 could be located. Prior to 1985, certain hazardous wastes, including possibly the Tars, were incinerated onsite in a liquid hazardous waste incinerator. Use of the onsite incinerator was discontinued in September 1982; the hazardous wastes were then shipped offsite for disposal.

From March 1985 to December 1985, seven (7) shipments of Tars were made to the Site (then known as Servicios Carbareon) by Cyanamid Agricultural de Puerto Rico, Inc. Copies of the seven (7) associated hazardous waste manifests are provided at the above link, in the folder titled "Request No. 10 Documents". See Bates Nos. BAPBV000002 through BAPBV0000013.

No one has any recollection of sending the Tars to the Site other than that which is evidenced by the seven (7) hazardous waste manifests provided herein. After December 1985, the Tars were disposed of at 3rd party waste management companies not associated with the Site.

11. *Describe how the Company came to possess the hazardous substances that came to be located at the Site.*

Response: The facility purchased toluene from a 3rd party supplier and used it as a solvent in its agrochemical manufacturing process. Spent solvent was recovered in an on-site distillation process, recovered toluene was reused in the process, and Tars were shipped off site to permitted waste management firms in accordance with regulatory requirements.

12. *List all hazardous substances used, generated, treated, stored, disposed of, manufactured, recycled, recovered, treated, or otherwise processed during the Company's operations at the Facility.*

Response: The Company objects to this Request as overly broad, burdensome, not reasonably calculated to lead to information concerning the identification, nature and quantity of hazardous substances, seeking information not in the Company's possession or control, and/or seeking information concerning the activities of entities unrelated to the Company. Without waiving objections, a list titled "Cyanamid Agricultural de Puerto Rico, Inc. Waste Streams Shipped to the Site", provided at the above link in the folder titled "Request No. 12 Documents" shows the hazardous wastes shipped to the Site from the Facility. See Bates No. BAPBV0000014.

13. *List and fully describe all waste streams generated from the Company's operations, including solid, liquid, or any other type of waste.*

Response: The Company objects to this Request as overly broad, burdensome, not reasonably calculated to lead to information concerning the identification, nature and quantity of hazardous substances, seeking information not in the Company's possession or control, and/or seeking information concerning the activities of entities unrelated to the Company. Without waiving objections, see list provided in response to Request No. 12 herein (Bates No. BAPBV0000014).

14. *Describe in detail the handling, storage, and disposal practices employed by the Company for each waste stream resulting from the Company's operations.*

Response: The Company objects to this Request as overly broad, burdensome, not reasonably calculated to lead to information concerning the identification, nature and quantity of hazardous substances, seeking information not in the Company's possession or control,

and/or seeking information concerning the activities of entities unrelated to the Company. Without waiving objections, see list provided in response to Request No. 12 herein (Bates No. BAPBV0000014).

15. *Identify all individuals who had responsibility for the Company's environmental and waste management decisions between 1975 and 1999 (e.g., responsibility for decisions regarding the disposal, treatment, storage, recycling, or sale of the Company's hazardous substances, hazardous wastes, and industrial wastes).*
- Provide each such individual's job title, duties, dates performing those duties, supervisors for those duties, current position, and if applicable, the date of the individual's resignation or termination.*
 - Provide the nature of the information possessed by each such individual concerning the Company's waste management.*

Response: The Company objects to this Request as overly broad, burdensome, not reasonably calculated to lead to information concerning the identification, nature and quantity of hazardous substances, seeking information not in the Company's possession or control, and/or seeking information concerning the activities of entities unrelated to the Company. Without waiving objection and upon information and belief, the following individuals may have had some responsibility for Cyanamid Agricultural de Puerto Rico, Inc.'s environmental and waste management decisions related to the Site (in 1985):

Frank Lequerica, Facility Manager (deceased)
Abel Robles, EHS Manager
Roberto Aguayo, Technical Manager
Freida Cruz, Procurement Agent (deceased)

16. *For each type of hazardous substance, hazardous waste, and industrial waste used or generated by the Company, describe the Company's agreements or other arrangements for its disposal, treatment, storage, recycling, or sale.*
- Provide any agreement and document, including waste logs, journals, manifests, or notes, related to any transfer of hazardous substances, hazardous wastes, and industrial wastes from the Company's Facility that came to be located at the Site.*
 - Provide all correspondence and written communications between the Company and each owner/operator of the Site regarding the Company's hazardous substances, hazardous wastes, and industrial wastes that came to be located at the Site.*

Response: The Company objects to this Request as overly broad, burdensome, not reasonably calculated to lead to information concerning the identification, nature and quantity of hazardous substances, seeking information not in the Company's possession or control, and/or seeking information concerning the activities of entities unrelated to the Company. Without waiving objection, see manifests provided in response to Request No. 10 herein (Bates Nos. BAPBV000002 through BAPBV0000013). No records were found of any contracts or correspondences between the Company and the Site.

17. *Provide agreements and documents related to the following, including waste logs, journals, manifests, or notes, as set forth below:*
- The locations where the Company sent each type of hazardous substance,*

- hazardous waste, and industrial waste for disposal, treatment, or recycling;*
- b. List all Waste Transporters used by the Company;*
 - c. For each type of hazardous substance, hazardous waste, and industrial waste, specify which Waste Transporter picked it up;*
 - d. For each type of hazardous substance, hazardous waste, and industrial waste, state how frequently each Waste Transporter picked up such waste;*
 - e. For each type of hazardous substance, hazardous waste, and industrial waste, provide the volume picked up by each Waste Transporter (per week, month, or year);*
 - f. For each type of hazardous substance, hazardous waste, and industrial waste, identify the dates (beginning & ending) such waste was picked up by each Waste Transporter;*
 - g. Indicate the ultimate location for each type of hazardous substance, hazardous waste, and industrial waste. Provide all documents indicating the ultimate disposal/recycling/treatment location for each type of hazardous substance, hazardous waste, and industrial waste;*
 - h. Describe how the Company managed pickups of each hazardous substance, hazardous waste, and industrial waste including but not limited to:*
 - i. The method for inventorying each type of hazardous substance, hazardous waste, and industrial waste;*
 - ii. The method for requesting each type of hazardous substance, hazardous waste, and industrial waste to be picked up;*
 - iii. The identity of the Waste Transporter employee/agent contacted for pickup of each type of hazardous substance, hazardous waste, and industrial waste; and*
 - iv. The amount paid or the rate paid for the pickup of each type of hazardous substance, hazardous waste, and industrial waste;*
 - i. Identify the individual or organization that selected the location where each of the Company's wastes were taken. Describe the basis for and provide any documents supporting the answer to this Request.*

Response: The Company objects to this Request as overly broad, burdensome, not reasonably calculated to lead to information concerning the identification, nature and quantity of hazardous substances, seeking information not in the Company's possession or control, and/or seeking information concerning the activities of entities unrelated to the Company. Without waiving objection and upon information and belief, see response to Request No. 12 for responses to Requests No. 17(a) through (g).

For Request No. 17(h), the Facility would maintain on-site waste inventories and contact waste transporters as needed within regulatory accumulation time frames to arrange shipment of waste to permitted 3rd party waste management facilities. No information is available on the individual employee / agent contacted for waste pickups, nor the amount paid and no responsive documents were located.

For Request No. 17(i), no information or responsive documents are available on the individual that selected the location where the facility's wastes were taken.

18. *If not already provided, specify the dates and circumstances when the Company's hazardous substances, hazardous wastes, and/or industrial wastes were sent, brought, or*

moved to the Site, and identify the names, addresses, and telephone numbers of the person(s) making arrangements for the containers (e.g., 55-gallon drum, dumpster, etc.) holding hazardous substances, hazardous wastes, and/or industrial wastes to be sent, brought, or transported to the Site. Please also provide all documents that support or memorialize the answer to this Request.

Response: See responses already provided. Further, persons involved with managing waste from the Company to the Site are identified in response to Request No. 15, each of whom were formerly based at the Manati Facility. Current contact information for such persons is unknown.

19. *Identify, describe, and provide all documents that refer or relate to the following:*

- a. The nature, including the chemical content, characteristics, physical state (e.g., solid, liquid), and quantity (volume and weight) of all hazardous substances, hazardous wastes, and industrial wastes involved in each arrangement transferring materials from any facility owned or operated by the Company (including the Facility) to any other facility;*
- b. In general terms, the nature and quantity of the non-hazardous substances involved in each such arrangement;*
- c. The hazardous substances being mixed or combined with other hazardous substances or non-hazardous substances for each such arrangement. Indicate whether such mixing or combining is common in the industry. Indicate whether the Company was ever asked to stop mixing or combining the hazardous substances with the non-hazardous substances;*
- d. Other materials other than the hazardous substances that were involved in the transaction;*
- e. The condition of the transferred material containing hazardous substances when it was stored, disposed of, treated, or transported for disposal or treatment;*
- f. The markings on and type, condition, and number of containers in which the hazardous materials were contained when they were stored, disposed, treated, or transported for disposal or treatment; and*
- g. All tests, analyses, analytical results, and manifests concerning each hazardous substance, hazardous waste, and industrial waste involved in each transaction. Include information regarding who conducted the test and how the test was conducted (batch sampling, representative sampling, splits, composite, etc.).*

Response: The Company objects to this Request as overly broad, burdensome, not reasonably calculated to lead to information concerning the identification, nature and quantity of hazardous substances, seeking information not in the Company's possession or control, and/or seeking information concerning the activities of entities unrelated to the Company. Without waiving objection and upon a diligent search of historical records pertaining to the Request, no responsive information or records were found.

20. *Indicate how long the Company has had a relationship with the owner(s) and/or operator(s) of the Site.*

Response: As stated in response to Request No. 10 above, the Company utilized the Site for disposal of Tars waste from March 1985 to December 1985.

21. *Identify any individuals, including former and current employees, who may be knowledgeable of the Company's operations and practices concerning the handling, storage, and disposal of hazardous substances.*

Response: See response to Request No. 15 above.

22. *Please provide all documents, if not already requested above, that support your responses to Requests #1 - #21, above.*

Response: All responsive documents are provided and referenced within the individual questions.

23. *If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If the records were destroyed, provide us with the following:*

- a. The Company's document retention policy between 1975 and 2018;*
- b. A description of how the records were destroyed (burned, trashed, etc.) and the approximate date of destruction;*
- c. A description of the type of information that would have been contained in the documents;*
- d. The name, job title, and most current address known by you of the person(s) who would have produced these documents, the person(s) who would have been responsible for the retention of these documents, the person(s) who would have been responsible for the destruction of these documents, and the person(s) who had and/or still may have the originals or copies of these documents; and*
- e. The names and most current address of any person(s) who may possess documents relevant to this inquiry.*

Response: Other than the Cyanamid Agricultural de Puerto Rico manifests that are provided herein, no other records related to the Company's dealings with the Site were found. It is unknown whether the records were destroyed. As stated above, the Company did not acquire the Facility until 2000 – fifteen (15) years after the Facility shipped the subject hazardous waste to the Site, and well beyond any regulatory retention requirements. A copy of Cyanamid Agricultural de Puerto Rico's Records Retention Policy in effect in 1985, the time during which the hazardous waste was shipped to the Site, is provided at the link above in the folder titled "Request No. 23 Documents". See Bates No. BAPBV0000015 through BAPBV0000024.

24. *Please provide copies of the Company's financial statements, shareholder's reports, financial audits, or other financial reports showing its assets, profits, liabilities, and current financial status for the last five years.*

Response: The Company objects to this Request as overly broad, burdensome, not reasonably calculated to lead to information concerning the identification, nature and quantity of hazardous substances, seeking information not in the Company's possession or control, and/or seeking information concerning the activities of entities unrelated to the Company. The Company is currently seeking information responsive to this Request. If such information is discovered, the Company will supplement this response within 30 days.

25. *List and provide a copy of all agreements or contracts, including but not limited to insurance policies and indemnification agreements, held or entered into by the Company or its parent corporation(s), subsidiary, or subsidiaries that could indemnify it against any liability that it may have under CERCLA for releases or threatened releases of hazardous substances at and from the Facility. In response to this Request, please provide not only those insurance policies and agreements that currently are in effect, but also provide those that were in effect during the period(s) when any hazardous substances, hazardous wastes, and/or industrial wastes may have been released or threatened to be released into the environment at or from the Facility.*

Response: The Company is currently seeking information on any relevant agreements/contracts, and pollution liability insurance policies that were or are in effect. If such information is discovered, the Company will supplement this response within 30 days.

26. *State whether any claim or claims have been made by the Company to any insurance company for any loss or damage related to operation at the Site, and if so, identify each claim by stating the name of the claimant, the name and address of the insurance company, the policy number, the named insured on the policy, claim number, date of claim, amount of claim, the specific loss or damage claimed, the current status of the claim, and the amount, date, and recipient of any payment made on the claim.*

Response: No claims have been made by the Company to any insurance company related to this issue.

27. *If you have reason to believe that there may be persons able to provide a more detailed or complete response to any question contained herein or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.*

Response: No other persons (other than those already identified in this submittal) would be able to provide any additional or more detailed information related to this inquiry.

28. *State the name, title, and address of each individual who assisted or was consulted in the preparation of the response to this Request for Information. In addition, state whether this person has personal knowledge of the information in the answers provided.*

Response: The following persons were involved or consulted in preparing responses to this Request for Information. Asterisked names had some involvement with the wastes shipped from the Facility to the Site.

- Tony Germinario, EHS Manager
- Doris Garcia, EHS Team Leader
- Frank Vaello, EHS Specialist
- Ricardo Morales Site Director
- Carlos Pineiro, Controller
- Nicole Sullivan, Senior Counsel, Environmental



We create chemistry

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

Commonwealth of Puerto Rico
Municipality of Manatí

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. I am also aware that I am under a continuing obligation to supplement my response to EPA's Request for Information if any additional information relevant to the matters addressed in EPA's Request for Information or my response thereto should become known or available to me.

AFFIDAVIT: -4,066-

By: Ricardo Morales, Site Director
BASF Agrochemical Products B.V., Puerto Rico Branch

Sworn to before me this 15th day of MAY, 2019.

Notary Public #17,394





Government of Puerto Rico

CERTIFICATE OF GOOD STANDING

I, LUIS G. RIVERA MARÍN, Secretary of State of the Government of Puerto Rico,

CERTIFY: That, pursuant to the provisions of Puerto Rico's General Law of Corporations, BASF AGROCHEMICAL PRODUCTS B.V., register number 11431, a for profit foreign - non us corporation, organized under the laws of Netherlands and duly authorized to do business in Puerto Rico since June 12, 2000, has complied with the filing of its Annual Reports.



IN WITNESS WHEREOF, the undersigned by virtue of the authority vested by law, hereby issues this certificate and affixes the Great Seal of the Government of Puerto Rico, in the City of San Juan, Puerto Rico, today, February 4, 2019.

A blue ink signature of Luis G. Rivera Marín, Secretary of State, is written over a horizontal line.

LUIS G. RIVERA MARÍN
Secretary of State

To validate this certificate go to:

<http://estado.pr.gov/>

This certificate can be validated an unlimited number of times before its expiration date of 04-Feb-2020.

Certificate Validation Number: 283161-66793112



Environmental
Quality
Board

COMMONWEALTH OF PUERTO RICO
ENVIRONMENTAL QUALITY BOARD

P.O. Box 11488, Santurce, Puerto Rico 00910

BAPBV0000002

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2000-0404. Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. PRD 091065102	Manifest Document No. 85002	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address Cyanamid Agricultural de PR, Inc. P.O. Box 243 Manatí, Puerto Rico 00701			A. State Manifest Document Number			
4. Generator's Phone 809-7854-1666			B. State Generator's ID			
5. Transporter 1 Company Name Clear Ambient			C. State Transporter's ID 84278-H			
6. US EPA ID Number PRD 090416132			D. Transporter's Phone 788-0905			
7. Transporter 2 Company Name			E. State Transporter's ID			
8. US EPA ID Number			F. Transporter's Phone			
9. Designated Facility Name and Site Address Servicios Carbareón RD 365, Km. 3.8 Bo. Tallaboa Pefuelas, Puerto Rico			G. State Facility's ID			
10. US EPA ID Number PRD 091018622			H. Facility's Phone 836-2058			
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.	
a. Flammable Liq. (NOS), Flammable UN 1993		No. 1	Type TT	2,000	G	D001
b.						
c.						
d.						
J. Additional Descriptions for Materials Listed Above Tars containing Toluene traces			K. Handling Codes for Wastes Listed Above S02			
15. Special Handling Instructions and Additional Information						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.						
Printed/Typed Name Frank Lequerica			Signature <i>[Signature]</i>		Date Month Day Year 02 28 85	
17. Transporter 1 Acknowledgement of Receipt of Materials			Signature <i>[Signature]</i>		Date Month Day Year 3 1 85	
Printed/Typed Name JUAN Cosme			Signature <i>[Signature]</i>		Date Month Day Year 3 1 85	
18. Transporter 2 Acknowledgement or Receipt of Materials			Signature		Date Month Day Year	
Printed/Typed Name			Signature		Date Month Day Year	
19. Discrepancy Indication Space						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.						
Printed/Typed Name			Signature		Date Month Day Year	

IN CASE OF EMERGENCY OF SPILL IMMEDIATELY CALL THE ENVIRONMENTAL QUALITY BOARD (809) 722-0439

GENERATOR

TRANSPORTER

FACILITY



Environmental
Quality
Board

COMMONWEALTH OF PUERTO RICO
ENVIRONMENTAL QUALITY BOARD

P.O. Box 11488, Santurce, Puerto Rico 00910

BAPBV0000003

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2000-0404. Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. PRD 091065102	Manifest Document No. 85003	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address Cyanamid Agrícola de PR, Inc. P.O. Box 243 Manatí, PR 00701					A. State Manifest Document Number	
4. Generator's Phone (809) 854-1666					B. State Generator's ID	
5. Transporter 1 Company Name Clear Ambient		6. US EPA ID Number PRD 090416132		C. State Transporter's ID 84278 H		
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone 788-0905		
9. Designated Facility Name and Site Address Servicios Carbareón RD 365, KM. 3.8 Bo. Tallaboa Peñuelas, Puerto Rico		10. US EPA ID Number PRD 091018622		E. State Transporter's ID		
				F. Transporter's Phone		
				G. State Facility's ID		
				H. Facility's Phone 836-2058		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers		13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. Flammable Liq. (NOS), F17mmable UN 1993		No. Type 1 TT		2,000	G	D001
b.						
c.						
d.						
J. Additional Descriptions for Materials Listed Above Tars containing Toluene traces		K. Handling Codes for Wastes Listed Above S0Z				
15. Special Handling Instructions and Additional Information						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.						
Printed/Typed Name Frank Lequerica		Signature <i>[Signature]</i>		Date Month Day Year 03 04 85		
17. Transporter 1 Acknowledgement of Receipt of Materials		Printed/Typed Name JUAN COSME		Signature <i>[Signature]</i>		Date Month Day Year 3 4 85
18. Transporter 2 Acknowledgement or Receipt of Materials		Printed/Typed Name		Signature		Date Month Day Year
19. Discrepancy Indication Space						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.						
Printed/Typed Name JUAN E. NEGRON		Signature <i>[Signature]</i>		Date Month Day Year		



Cyanamid Agrícola de Puerto Rico, Inc.
P.O. Box 243
Manatí, Puerto Rico 00701

Telex: ITT: 345 0585
Tels.: (809) 854-1076-3436

21 de mayo de 1985

CARTA CERTIFICADA #842289

Sra. María Rodríguez
Junta de Calidad Ambiental
Negociado de Desperdicios Peligrosos.
Apartado 11488
Santurce, Puerto Rico 00910

Estimada señora Rodríguez:

Les estamos enviando su copia de los manifiestos #85004
y #85005, generados por nuestra compañía.

Sin nada más, queda de usted,

Cordialmente,

A handwritten signature in cursive script that reads 'Frank Vaello'.

Frank Vaello
Process Chemist

/ms

xc: Sr. F. Lequerica



Environmental
Quality
Board

COMMONWEALTH OF PUERTO RICO BAPBV0000005

ENVIRONMENTAL QUALITY BOARD

P.O. Box 11488, Santurce, Puerto Rico 00910

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2000-0404. Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. PRD 091065102	Manifest Document No. 85004	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address Cyanamid Agricultural de PR, Inc. P.O. Box 243 Manatí, PR 4. Generator's Phone (809) 854-1666			A. State Manifest Document Number			
5. Transporter 1 Company Name Clear Ambient			B. State Generator's ID			
6. US EPA ID Number PRD 090416132			C. State Transporter's ID			
7. Transporter 2 Company Name			D. Transporter's Phone			
8. US EPA ID Number			E. State Transporter's ID			
9. Designated Facility Name and Site Address Servicios Carbareón RD 365, Km. 3.8, Bo. Tallaboa Peñuelas, Puerto Rico			F. Transporter's Phone			
10. US EPA ID Number PRD 091018622			G. State Facility's ID			
H. Facility's Phone 836-2058						
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.	
a. Flammable Liq. (NOS), Flammable UN 1993		No. 1	Type TT	1,800	G	D001
b.						
c.						
d.						
J. Additional Descriptions for Materials Listed Above Tars containing Toluene traces			K. Handling Codes for Wastes Listed Above S02			
15. Special Handling Instructions and Additional Information						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.						
Printed/Typed Name Frank Lequerica			Signature <i>[Signature]</i>		Date Month Day Year 05-15-85	
17. Transporter 1 Acknowledgement of Receipt of Materials			Signature		Date	
Printed/Typed Name			Signature		Month Day Year	
18. Transporter 2 Acknowledgement or Receipt of Materials			Signature		Date	
Printed/Typed Name Juan Cosme			Signature <i>[Signature]</i>		Month Day Year 5-15-85	
19. Discrepancy Indication Space						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name			Signature		Date Month Day Year	



BAPBV0000006

Cyanamid Agrícola de Puerto Rico, Inc.
P.O. Box 243
Manatí, Puerto Rico 00701

Telex: ITT: 345 0585
Tels.: (809) 854-1076-3436

21 de mayo de 1985

CARTA CERTIFICADA #842289

Sra. María Rodríguez
Junta de Calidad Ambiental
Negociado de Desperdicios Peligrosos.
Apartado 11488
Santurce, Puerto Rico 00910

Estimada señora Rodríguez:

Les estamos enviando su copia de los manifiestos #85004
y #85005, generados por nuestra compañía.

Sin nada más, queda de usted,

Cordialmente,

A handwritten signature in cursive script that reads 'Frank Vaello'.

Frank Vaello
Process Chemist

/ms

xc: Sr. F. Lequerica



Environmental
Quality
Board

COMMONWEALTH OF PUERTO RICO BAPBV0000007

ENVIRONMENTAL QUALITY BOARD

P.O. Box 11488, Santurce, Puerto Rico 00910

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2000-0404. Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. PRD 091065102	Manifest Document No. 85005	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.		
3. Generator's Name and Mailing Address Cyanamid Agricultural de PR, Inc. P.O. Box 243 Manatí, PR 00701 Generator's Phone (809) - 854-1666				A. State Manifest Document Number			
5. Transporter 1 Company Name Clear Ambient				B. State Generator's ID			
6. US EPA ID Number PRD 090416132				C. State Transporter's ID			
7. Transporter 2 Company Name				D. Transporter's Phone			
8. US EPA ID Number				E. State Transporter's ID			
9. Designated Facility Name and Site Address Servicios Carbareón RD 365, Km. 3.8 Bo. Tallaboa Peñuelas, Puerto Rico				F. Transporter's Phone			
10. US EPA ID Number PRD 091018622				G. State Facility's ID			
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				12. Containers No. Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. Flammable Liq. (NOS), Flammable UN 1993				1 TT	1,500	G	D001
b.							
c.							
d.							
J. Additional Descriptions for Materials Listed Above Tars containing Toluene traces				K. Handling Codes for Wastes Listed Above S0Z			
15. Special Handling Instructions and Additional Information							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.							
Printed/Typed Name Frank Lequerica				Signature 		Date Month Day Year 05 16 85	
17. Transporter 1 Acknowledgement of Receipt of Materials				Signature 		Date Month Day Year 5 20 85	
Printed/Typed Name JUAN COSME				Signature		Date Month Day Year	
18. Transporter 2 Acknowledgement or Receipt of Materials				Signature		Date Month Day Year	
Printed/Typed Name				Signature		Date Month Day Year	
19. Discrepancy Indication Space							
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.							
Printed/Typed Name				Signature		Date Month Day Year	



Manifestos

BAPBV0000008

Cyanamid Agricultural de Puerto Rico, Inc.
P.O. Box 243
Manatí, Puerto Rico 00701

Telex: ITT: 345 0585
Tels.: (809) 854-1076-3436

22 de agosto de 1985

File

CARTA CERTIFICADA #4224552

Sra. María Rodríguez
Junta de Calidad Ambiental
Negociado de Desperdicios Peligrosos
Apartado 11488
Santurce, Puerto Rico 00910

Estimada señora Rodríguez:

Les estamos enviando su copia de los manifiestos #85007
y #85008, generados por nuestra compañía.

Sin nada más, queda de usted,

Cordialmente,

Frank Vaello
Process Chemist

/ms

xc: Sr. F. Lequerica



COMMONWEALTH OF PUERTO RICO
Environmental Quality Board
P.O. Box 11488, Santurce, Puerto Rico 00910

BAPBV0000009

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2000-0404. Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. PRD 091065102	Manifest Document No. 85008	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address Cyanamid Agrícola de PR, Inc. P.O. Box 243 Manati, PR 00701 4. Generator's Phone (809) 854-1666				A. State Manifest Document Number	
5. Transporter 1 Company Name Servicios Carbareón, Inc.				B. State Generator's ID	
6. US EPA ID Number PRD 091013622				C. State Transporter's ID 10256R	
7. Transporter 2 Company Name N/A				D. Transporter's Phone 301-854-1666	
8. US EPA ID Number				E. State Transporter's ID N/A	
9. Designated Facility Name and Site Address Servicios Carbareón RD 365, Km. 3.8 Bo. Tallaboa Pefuelas, PR				F. Transporter's Phone N/A	
10. US EPA ID Number PRD 091013622				G. State Facility's ID N/A	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				12. Containers	13. Total Quantity
				No.	Type
a. N.D.S. Flammable Liquid NOX, Flammable UN 1993				8	DM
b. 10 drums					440
c.					G
d.					
J. Additional Descriptions for Materials Listed Above Tare containing Toluene traces				K. Handling Codes for Wastes Listed Above S01	
15. Special Handling Instructions and Additional Information Soybean Casein Digest Medium (TSB) 3 drums 900 p					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.					
Printed/Typed Name John M. Asbeck		Signature [Signature]		Date 08/16/85	
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature [Signature]		Date 8/16/85	
18. Transporter 2 Acknowledgement or Receipt of Materials		Signature [Signature]		Date N/A	
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.					
Printed/Typed Name JUAN E. NEGRÓN		Signature [Signature]		Date 08/16/85	

IN CASE OF EMERGENCY OF SPILL IMMEDIATELY CALL THE ENVIRONMENTAL QUALITY BOARD (809) 722-0439

GENERATOR
TRANSPORTER
FACILITY



BAPBV0000010

Cyanamid Agrícola de Puerto Rico, Inc.
P.O. Box 243
Manatí, Puerto Rico 00701

Telex: ITT: 345 0585
Tels.: (809) 854-1076-3436

30 de octubre de 1985

CARTA CERTIFICADA # P 161 261 484

Sra. María Rodríguez
Junta de Calidad Ambiental
Negociado de Desperdicios Peligrosos
Apartado 11488
Santurce, Puerto Rico 00910

Estimada señora Rodríguez:

Les estamos enviando su copia del manifiesto #85010, generados por nuestra compañía.

Sin nada más, queda de usted,

Cordialmente,

Frank Vaello
Process Chemist

/av

cc: Sr. F. Lequerica



Environmental
Quality
Board

COMMONWEALTH OF PUERTO RICO
ENVIRONMENTAL QUALITY BOARD
P.O. Box 11488, Santurce, Puerto Rico 00910

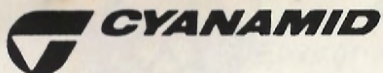
BAPBV0000011

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2000-0404. Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address Cyanamid Agrícola de P.R., Inc. P.O. Box 243 Manati, Puerto Rico 00701		4. Generator's US EPA ID No. PRD 091065102		A. State Manifest Document Number		
5. Transporter 1 Company Name Clear Ambient		6. US EPA ID Number PRD 090116112		B. State Generator's ID		
7. Transporter 2 Company Name N/A		8. US EPA ID Number		C. State Transporter's ID 24278-H		
9. Designated Facility Name and Site Address Servicios Carbareón RD 365, Km. 3.8 Bo. Tallaboa Peñuelas, Puerto Rico		10. US EPA ID Number PRD 091018622		D. Transporter's Phone 788-0905		
				E. State Transporter's ID		
				F. Transporter's Phone		
				G. State Facility's ID		
				H. Facility's Phone 836-2058		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers	13. Total Quantity	14. Unit	I. Waste No.	
a. Flammable Liq. (NOS), Flammable UN 1993		No. 1	Type TT	2,200	G	0001
b.						
c.						
d.						
J. Additional Descriptions for Materials Listed Above Tars containing Toluene traces		K. Handling Codes for Wastes Listed Above S04				
15. Special Handling Instructions and Additional Information						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. "Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment."						
Printed/Typed Name John M. Asbeck		Signature [Signature]		Date Month Day Year 10 29 85		
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature [Signature]		Date Month Day Year 10 29 85		
Printed/Typed Name JUAN COSME		Signature [Signature]		Date Month Day Year 10 29 85		
18. Transporter 2 Acknowledgement or Receipt of Materials		Signature [Signature]		Date Month Day Year 10 29 85		
Printed/Typed Name		Signature		Date Month Day Year		
19. Discrepancy Indication Space						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name JUAN E. NEGRÓN		Signature [Signature]		Date Month Day Year 11 01 85		

IN CASE OF EMERGENCY OF SPILL IMMEDIATELY CALL THE ENVIRONMENTAL QUALITY BOARD (809) 722-0439



BAPBV0000012

Cyanamid Agricultural de Puerto Rico, Inc.
P.O. Box 243
Manatí, Puerto Rico 00701

Telex: ITT: 345 0585
Tels.: (809) 854-1076-3436

9 de diciembre de 1985

CARTA CERTIFICADA #P392 060 083

Sra. María Rodríguez
Junta de Calidad Ambiental
Negociado de Desperdicios Peligrosos
Apartado 11488
Santurce, Puerto Rico 00910

Estimada señora Rodríguez:

Le estamos enviando su copia del manifiesto #85011, generado por nuestra compañía.

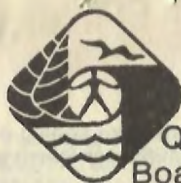
Sin nada más, queda de usted,

Cordialmente,

Frank Vaello
Process Chemist

/av

xc: Sr. F. Lequerica



Environmental
Quality
Board

COMMONWEALTH OF PUERTO RICO
ENVIRONMENTAL QUALITY BOARD
P.O. Box 11488, Santurce, Puerto Rico 00910

BAPBV0000013

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2000-0404. Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address Cyanamid Agrícola de P.R., Inc. P.O. Box 243 Manati, Puerto Rico 00701		4. Generator's Phone (589) 844-9288		A.State Manifest Document Number		
5. Transporter 1 Company Name Servicios Carbarosa Inc.		6. US EPA ID Number PRD 091018622		B.State Generator's ID		
7. Transporter 2 Company Name		8. US EPA ID Number		C.State Transporter's ID		
9. Designated Facility Name and Site Address Servicios Carbarosa RD 365, KM. 308 Bo. Tallaboa Pajuelo, Puerto Rico		10. US EPA ID Number PRD 091018622		D.Transporter's Phone 787-702		
				E.State Transporter's ID		
				F.Transporter's Phone		
				G.State Facility's ID		
				H.Facility's Phone 836-2058		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.	
a. Flammable Liquid N.O.S., Flammable Un 1993		No. 48	Type DM	3,700	G	0001
b.						
c.						
d.						
J. Additional Descriptions for Materials Listed Above Tars containing Tokusene traces		K.Handling Codes for Wastes Listed Above 601				
15. Special Handling Instructions and Additional Information						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. "Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment."						
Printed/Typed Name Frank Valle		Signature Frank Valle		Date Month Day Year 12 04 85		
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature Gonzalez Torres		Date Month Day Year 12 04 85		
18. Transporter 2 Acknowledgement or Receipt of Materials		Signature Ramos		Date Month Day Year		
19. Discrepancy Indication Space						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name		Signature		Date Month Day Year		

IN CASE OF EMERGENCY OF SPILL IMMEDIATELY CALL THE ENVIRONMENTAL QUALITY BOARD (809) 722-0439

GENERATOR

TRANSPORTER

FACILITY

Wastestreams Shipped from Cyanamid Agrochemical de Puerto Rico, Inc. to the Site (since 1975)

Waste description	Manifest Document No.	Shipment date	Containers no.	Containers Type	Total quantity	Waste no.	TSDf Handling code	Designated Facility	Trensporter
Flammable Liquid NOS, Flammable UN 1993 (Tars containing Toluene traces)	85002	03/01/85	1	TT	2,000 gal.	D001	S02	Servicios Carbareón Rd. 365, Km. 3.8 Bo. Tallaboa, Peñuelas, P.R. (EPA ID: PRD091018622)	Clear Ambient (EPA ID PRD090416132)
Flammable Liquid NOS, Flammable UN 1993 (Tars containing Toluene traces)	85003	03/04/85	1	TT	2,000 gal.	D001	S02	Servicios Carbareón Rd. 365, Km. 3.8 Bo. Tallaboa, Peñuelas, P.R. (EPA ID: PRD091018622)	Clear Ambient (EPA ID PRD090416132)
Flammable Liquid NOS, Flammable UN 1993 (Tars containing Toluene traces)	85004	05/15/85	1	TT	1,800 gal.	D001	S02	Servicios Carbareón Rd. 365, Km. 3.8 Bo. Tallaboa, Peñuelas, P.R. (EPA ID: PRD091018622)	Clear Ambient (EPA ID PRD090416132)
Flammable Liquid NOS, Flammable UN 1993 (Tars containing Toluene traces)	85005	05/20/85	1	TT	1,500 gal.	D001	S02	Servicios Carbareón Rd. 365, Km. 3.8 Bo. Tallaboa, Peñuelas, P.R. (EPA ID: PRD091018622)	Clear Ambient (EPA ID PRD090416132)
Flammable Liquid NOS, Flammable UN 1993 (Tars containing Toluene traces)	85008	08/16/85	8	DM	440 gal.	D001	S01	Servicios Carbareón Rd. 365, Km. 3.8 Bo. Tallaboa, Peñuelas, P.R. (EPA ID: PRD091018622)	Servicios Carbareón EPA ID: PRD091018622
Flammable Liquid NOS, Flammable UN 1993 (Tars containing Toluene traces)	85010	10/29/85	1	TT	2,200 gal.	D001	S02	Servicios Carbareón Rd. 365, Km. 3.8 Bo. Tallaboa, Peñuelas, P.R. (EPA ID: PRD091018622)	Clear Ambient (EPA ID PRD090416132)
Flammable Liquid NOS, Flammable UN 1993 (Tars containing Toluene traces)	85011	12/04/85	68	DM	3,700 gal.	D001	S01	Servicios Carbareón Rd. 365, Km. 3.8 Bo. Tallaboa, Peñuelas, P.R. (EPA ID: PRD091018622)	Servicios Carbareón EPA ID: PRD091018622

Note:
TT = Tank Truck
DM= Metal Drum
S01= Storage drum
S02= Storage tank

**CYANAMID**American Cyanamid Company
Standard Practice Instruction

NUMBER

PR 12 D 1

PAGE

1 OF 4

SUPERSEDES
Previous Issue
dated 7-24-74

DATE ISSUED

8-24-78

SUBJECT

Records Retention

APPROVED

D. Carroll/G. Sutherland

1. PURPOSE

To outline a records management program that will appraise and evaluate records based upon their administrative and legal value, and will provide for proper care and timely disposition of Company records.

2. SCOPE

All facilities of the Lederle and Medical Research Divisions.

3. MANAGEMENT SUPPORT AND RESPONSIBILITIES

* a. Corporate and Division Management support of the records program is evidenced through policy directives and mandated maintenance of a new Record Retention Manual prepared in our Corporate Office for compliance by all Cyanamid Divisions.

b. ~~Responsibility is assigned to individual~~ Section Heads to evaluate their records and maintain them in as economical and efficient a method as possible. Their basic responsibility is to identify their records and determine their essentiality. Assistance for this responsibility is coordinated via Sectional Coordinators.

c. All new or revised retention schedules will be approved by Manager, Office Services (Division Coordinator), Division Controller and Division Legal Counsel and then forwarded to Corporate for final approval.

d. Office Services will assist in the implementation of the program and determine program compliance.

4. GENERAL

a. A records management program means planned protection of records required to continue operations and to protect the legal and financial status of the Company, and the rights of employees and customers.

b. A centralized area or record center is provided for the housing and maintenance of inactive or semi-inactive records on which the reference rate does not warrant retention in office space and in office equipment.

c. Office Services maintains a continuing program of records transfer, protection and disposition. This total approach of scheduling through inventory, appraisal and approval is planned to result in significant cost reduction action, and certainty that disposal of records is conducted in an orderly business-like manner.

5. EVALUATION OF RECORDS BY DEPARTMENT MANAGERS

a. Department Managers will:

1) make an end determination for all records

ISSUED BY

MANAGEMENT SERVICES, PEARL RIVER

American Cyanamid Company	NUMBER PR 12 D 1	DATE ISSUED 8-24-78	PAGE 2 of 4
---------------------------	---------------------	------------------------	----------------

even though the end may be years away. However, vital records essential to the reconstruction and resumption of operations of the Company in the event of disaster should be kept as permanent records.

- 2) Abide with the Corporate Retention Manual but will have the obligation to refer any record they feel should be retained for a retention period different from the manual to the Division Coordinator who will contact appropriate Corporate and Division Management for an exception ruling.
- 3) Protect "Frozen Category" records, so categorized as the result of Government investigation, litigation or otherwise. Keep these records until the Pearl River Division Legal Counsel issues a formal release.
- 4) Not retain unnecessary records. Think in terms of what is absolutely necessary for maintaining a good operation, not in terms of what you would like to have.
- 5) Emphasize that the accumulation of records is meaningless unless they can be put to immediate use as soon as required to avoid a stop in business, or to substantiate a claim.
- 6) Remove non-current, essential records from high-cost office space and equipment to low-cost record storage.
- 7) Determine which one of the copies of a record should be kept in the storage center; eliminate duplication of records.
- 8) Establish the total life of a document - how long to be kept in the office and how long in record storage.
- 9) Cooperate fully with Office Services personnel who are assigned the function of checking the contents of record storage on a scheduled basis to assure that storage space is best utilized. Scheduled destruction of records ensures low maintenance cost and control of equipment purchases.

6. FORMS USED

NA 1741 - Records Retention Schedule
LPR 4353 - Records Storage Material Log
LPR 2129 - File Drawer Record
LPR 2128 - Loan Record
GOF 429 - Destruction of Storage Records

7. PROCEDURE

a. Office Services Personnel will:

- 1) Assist via Sectional Coordinators, any department requiring schedules for maintenance of department records as indicated in the Records Retention Schedule, NA 1741 (Exhibit B), using terms explained in Standard Retention Codes (Exhibit A). The periods that files should be retained in the office and storage are shown.

American Cyanamid Company	NUMBER	DATE ISSUED	PAGE
	PR 12 D 1	8-24-78	3 OF 4

- 2) Resolve any questions pertaining to the Record Retention Schedules.
- 3) Distribute via Sectional Coordinators, Records Retention Schedules to each department as appropriate, and send copies of the complete manual to Records Storage and other staff and management personnel responsible for the records program.
- 4) Issue corrected NA 1741 schedule sheets when advised of changes by Corporate Management.

b. Departments Heads will:

- 1) Periodically (at least annually) instruct supervisors to review their files using approved Records Retention Schedules as a guide to:
 - ..destroy records that are no longer necessary
 - ..transfer non-current essential files to Records Storage (See SPI PR 12A1)
 - ..notify Office Services of any recommended revisions in retention schedules
 - ..advise Records Storage to dispose of records that have reached maximum retention period.
- 2) Request transfiles from Records Storage when needed.
- 3) Prepare Record Storage Material form, LPR 4353 (Exhibit C) to accompany material that is being transferred to Records Storage.
- 4) Telephone Records Storage to request loan of file or to notify them to destroy retention files.

c. Records Storage will:

- 1) Assign Records Storage File No. to copy of LPR 4353 which accompanies material to storage; returns one copy to issuing department; files remaining copy by Department Number.
- 2) Ensure that retention date, entered by issuing department, conforms to retention date on approved Retention Records.
- 3) Prepare File Drawer Record, LPR 2129 (Exhibit D) for all material received at Records Storage; assigns Flat No., File No., File Location, Name of person responsible for material, and Dept. No.; maintains this record by File No.
- 4) Prepare Loan Record, LPR 2128 (Exhibit E) when material is loaned to a requesting department; maintains this log in chronological order and in department order.
- 5) Periodically (at least annually) review department records to determine which files have reached retention dates; calls department to advise them of this situation; and prepares Destruction of Storage Records, GOF 429 (Exhibit F)

American Cyanamid Company	NUMBER	DATE ISSUED	PAGE
	PR 12 D 1	8-24-78	4 OF 4

and submits to Department Head for approval to destroy records.

- 6) Destroy after receipt of an approved destruction notice, and have destruction properly witnessed.

d. Office Services will:

- 1) Coordinate, through the Sectional Coordinators, the administration of the Records Retention Schedules.
- 2) Ensure that information on Records Retention Schedules is kept current and that the departments comply with approved schedules.
- 3) Investigate requests for file cabinets (SPI PR 12A1) and determines need as related to possible transfer of material to Records Storage to avoid such purchases.
- 4) Request approval of recommended changes or additions to Records Retention Schedules from appropriate Corporate and Division Management.

STANDARD RETENTION CODES

Code	Title	Description
AA	After Internal Audit	Required until completion of Internal Audit.
C	Current	Current year only
CON/R	Continuation	Used primarily for index records and records of this type where additions to the file are continuously being made as records are generated. These type records have a limited retention value and the files are to be reviewed <u>annually</u> for records no longer required.
CPL	Completion	Until completion of transaction or activity involved. Records used and/or prepared in studies, analyses, proposals, and the like. Can be routine or special.
DAU	Destroy After Use	Records of a very limited use. Copies of reports, correspondence, etc., for information purposes only.
DSP	Until Disposal	Upon disposal of the asset, the records are no longer required, such as property, machines, equipment, systems/programs, etc.
DP	Death of Pensioner	Records no longer required upon notification of the death of a pensioner/beneficiary.
EXP	Expiration Date	Predetermined time or date - such as policies, service contracts, agreements, and the like.
FD	Final Determination	Required for Federal, State, and Municipal Tax Audits. Corporate Tax Department will advise annually when audit has been completed.

Code	Title	Description
LOC	Life of Company	Determined that it is essential that these records be held for the <u>life</u> of the <u>company</u> - forever.
LOP	Life of Product	Records essential to protect the interests of the company so long as the product is manufactured by the company.
MO	Month	Records required for less than a year.
PREC	Preceding	Where <u>both</u> the latest as well as the <u>immediate</u> <u>preceeding</u> records are to be held.
R	Annual Review	Subject to annual review. To be reviewed annually to determine those records no longer needed.
SUP	Until Superseded	Held until replacement by most recent document - usually routinely.
T	Termination Date	Upon completion of an act such as employment, contracts that cover performance of a specific act, customer relations, and the like.
UPC	Until Project is Closed	Records generated and/or used that pertain to specific projects. Usually controlled by project or job control codes - such as Engineering, Construction, Job Orders, Projects, etc.

NOTE: (1) Where two retentions are given, the longer one applies, i.e., C + 6 or FD + 1.

(2) The above may be followed by a number, indicating years (+1 indicating plus one year).

AMERICAN CYANAMID COMPANY

Effective Date

[illegible]

LEGEND: V = INDICATES CLASSIFIED AS A

P1 = ASTERICK (*) INDICATES HOLDER OF

DO - ASTERICK (*) IDENTIFIES OTHER FUNCTION/ACTIVITY AS

BAPBV0000021

SPI PR 12D1 8-24-78 EXHIBIT B

LOAN RECORD

Dept.: _____ Name: _____

[illegible]

LPR 2128